

National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



February 5, 2013

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Widely Attended Gathering Determination Regarding Attendance by NASA Employees at a Reception and the Goddard Memorial Dinner, hosted by the National Space Club (NSC) on March 22, 2013

On March 22, 2013, the National Space Club (NSC) will host and sponsor a reception and the Goddard Memorial Dinner at the Washington Hilton, 1919 Connecticut Avenue, N.W., Washington, D.C. from 6:30 p.m. to 10 p.m. The NSC is a non-profit organization under Section 501(c)(6) of the IRS code that does not employ lobbyists, and which has both individual and corporate members, including NASA contractors.

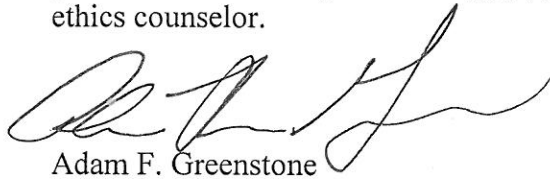
The event will be attended by senior leaders of the aerospace industry, congressional staff, representatives from academia and the media, personnel from other Federal agencies, students who are being recognized, and other members of the general public. Approximately 4,000 people have been invited. The estimated cost of the event, which includes all food and beverages, is \$350.00 per person for non-members. As in prior years, the NSC will invite government guests, and will also assign table seating. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs and operations. Attendance at the dinner and reception will allow NASA representatives to exchange views and ideas with others in attendance, many of whom hold substantial roles in aerospace professions or other areas related to NASA's programs. Accordingly, NASA employees whose duties do not substantially affect the NSC or a majority of its corporate members – including NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 – may accept an invitation for free attendance to the dinner and reception. A list of NSC corporate members is available at the following Internet link:  
<http://www.spaceclub.org/about/corporate.html>.

In addition, some NASA invitees may also receive an invitation to attend an awardee recognition reception for approximately 100 attendees including the student and professional award winners, representatives of Congress and the executive branch, and industry. The average value of refreshments served to each attendee will be approximately \$25. This determination covers attendance at the awardee recognition reception to those NASA employees who are invited.

This widely attended gathering determination does not cover the receptions in hospitality suites that will occur after the Goddard Memorial Dinner concludes. These suites will be hosted by nine corporate sponsors. Most NASA employees who are invited may receive refreshments provided in these suites under the exception to the gift rules that allows acceptance of gifts (including refreshments and tangible gift items) with an aggregate value of \$20 or less per event. If \$20 or more is consumed, the employee should personally provide that amount in honor baskets that the NSC will provide. However, non-career NASA employees subject to the Ethics Pledge required by Executive Order 13490 must provide reimbursement for the fair market value of any refreshments they or their guests consume in the hospitality suites.

Moreover, NASA employees whose duties may substantially affect the NSC or a majority of its members, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read 'Adam F. Greenstone', is written over the printed name.

Adam F. Greenstone